

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)
)
EASTERN LIVESTOCK CO., LLC,) CASE NO. 10-93904-BHL
) CHAPTER 11
)
Debtor.)

**MOTION FOR ORDER ESTABLISHING PROCEDURES
FOR CERTAIN ADVERSARY PROCEEDINGS**

James A. Knauer, as Chapter 11 Trustee for Eastern Livestock Co., LLC, ("ELC" or "Debtor"), and for his Motion for Order Establishing Procedures for Certain Adversary Proceedings ("Motion"), states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b)(2) and 1334.
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. Certain petitioning creditors commenced the above-captioned chapter 11 case (the "Chapter 11 Case") on December 6, 2010, ("Petition Date") by filing an involuntary petition for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of Indiana, New Albany Division ("Court"). This Court entered the Order for Relief in An Involuntary Case and Order to Complete Filing on December 28, 2010. ECF No. 110.
4. On December 28, 2010, James A. Knauer was appointed as the Chapter 11 Trustee for ELC ("Trustee"). ECF No. 102.

5. On January 25, 2012, the Trustee filed his Motion to Approve Certain Preference Avoidance Protocols and Terms of Settlement ("Motion to Approve Preference Protocols"). ECF. No. 977.

6. As set forth in the Motion to Approve Preference Protocols, the Trustee's counsel reviewed transfers to more than eight hundred and fifty (850) transferees during the ninety (90) day period prior to the Petition Date in order to identify those transferees with likely net preference exposure ("Estimated Net Exposure").

7. In the Motion to Approve Preference Protocols, the Trustee sought authority from the Court to send demand letters under Rule 408 of the Federal Rules of Evidence to those transferees with Estimated Net Exposure to settle claims in the amount of the Estimated Net Exposure in lieu of filing adversary proceedings.¹

8. On February 15, 2012, the Court entered the Order Granting Trustee's Motion to Approve Certain Preference Protocols and Terms of Settlement ("Preference Protocols Order"). ECF No. 1035.

9. Pursuant to the Preference Protocols Order, the Trustee expressly retained his rights to pursue litigation where the Trustee's claims and causes of action include the potential avoidance of transfers arising under 11 U.S.C. § 547 ("Preference Actions"), among others.

10. As of the date of this Motion, the Trustee has filed in excess of sixty (60) Preference Actions. A list of the Preference Actions to be addressed by this Motion and of each Defendant is attached hereto and incorporated herein by reference as **Exhibit A**. The Trustee also has commenced other actions under Chapter 5 of the

¹ The Motion to Approve did not seek approval to settle claims against Fifth Third Bank or statutory or non-statutory insiders.

Bankruptcy Code that he intentionally omits from the Preference Actions, as defined herein, based generally in the complexity of the actions, the inclusion of claims that do not arise under Chapter 5, and/or where one or more of the named defendants is an insider of the Debtor.

SUMMARY OF RELIEF REQUESTED

11. The Trustee seeks entry of an order establishing certain procedures in the Preference Actions (“Preference Action Procedures”), substantially in the form attached as **Exhibit B** hereto (the “Procedures Order”), and as summarized below,² including the establishment of mandatory mediation procedures in the event the Trustee is unable to settle Preference Actions, the appointment of a certain mediator, discovery guidelines, and pretrial guidelines to ensure the just, speedy, and inexpensive determination of each Preference Action.

12. Expeditious and economical resolution of the Preference Actions is in the bests interests of the Chapter 11 estate.

13. The Trustee prefers to resolve the Preference Actions as early as possible through good faith negotiations, including the voluntary exchange of information regarding the Trustee’s claims and the defendant(s)’ defenses.

14. Beginning with the analysis as set forth in the Motion to Approve Preference Protocols, and focusing on transferees the Trustee assesses to have Estimate Net Exposure, the Trustee’s efforts to date have reduced the number of

² The Preference Action Procedures are detailed in the Procedures Order; whereas, this section only summarizes the relief being requested. To the extent that there is a conflict between the procedures summarized in this Motion and the procedures detailed in the Procedures Order, the Procedures Order shall take precedence.

potential preference actions requiring litigation and resulted in settlement of several preference claims.

15. Nevertheless, absent implementation of the streamlined procedures requested herein, the substantial number of the Preference Actions threatens to subject the Trustee to an overabundance of repetitive discovery requests, hearings, and trials, which would result in the unnecessary expenditure of time, effort, and funds by the Trustee to the detriment of the Chapter 11 estate.

SUMMARY OF PROCEDURES

Summary of Proposed Pretrial Conference Procedures

16. The Trustee seeks the setting of an omnibus telephonic pretrial conference for all Preference Actions ("Pretrial Conference"). Prior to the Pretrial Conference, the Trustee and defendants in each of the Preference Actions will exchange preliminary information of the claims and defenses as detailed in the Procedures Order.

17. During the Pretrial Conference, the Trustee shall also address non-responsive defendants by moving for default judgment and serving the applicable defendants with a notice in the form of **Exhibit C** attached hereto. After the appropriate notice is given, the Trustee will request the Court to enter a default judgment without hearing except as otherwise provided for in the Procedures Order.

Summary of Proposed Settlement and Mediation Procedures

18. The Trustee will engage in settlement negotiations to the furthest extent possible and respond to all outstanding settlement offers within twenty-one (21) days prior to the date of the Pretrial Conference.

19. For those Preference Actions that the Trustee is unable to settle, the Trustee may elect mandatory mediation by giving notice as described in the Procedures Order.

20. The parties shall consult to select a mediator. In the event that the parties cannot otherwise agree, Phillip L. Kunkel with Gray, Plant & Moody, LLC, shall serve as mediator.

21. Phillip L. Kunkel has previously been appointed and approved as mediator in the Chapter 11 Case.³

22. Mediations shall take place at a time and in a location agreed upon by the parties, but shall generally be conducted in the offices of the mediator, unless otherwise agreed to by the parties and the mediator.

23. All mediations shall be conducted in accordance with the Procedures Order and otherwise the mediator shall control all procedural aspects of the mediation, including: finalizing dates, times, and places for conducting sessions of the mediation; requiring the submission of confidential statements; designing and conducting the mediation sessions; and establishing a deadline for the parties to act upon a settlement proposal.

24. Parties shall share equally in the cost of mediation, including the mediator's fees and allocated expenses of the mediator.

25. Within seven (7) days from the conclusion of the mediation, the mediator shall file a report, signed by all parties and their counsel, advising the Court whether or not the matter has been settled.

³ Order Granting Application to Approve Phillip L. Kunkel as Mediator, Jan. 17, 2012, ECF No. 968.

Summary of Proposed Discovery Procedures

26. The Trustee seeks a stay of all formal discovery in each of the Preference Actions until May 1, 2013 in order to allow for the prompt mediation of the actions. The Trustee will cooperate in responding to informal discovery requests that aid in the mediation process.

27. The Trustee reserves all rights to request from this Court an order that further stays discovery and/or establishes uniform discovery procedures in the event that it believes such procedures would be beneficial.

BASIS FOR RELIEF

28. Judges hearing matters under the Bankruptcy Code have broad authority to regulate the practices and procedure of all matters before them. See Fed. R. Bankr. P. 9029(b) (“A judge may regulate practice in any manner consistent with federal law, these rules, Official Forms, and local rules of the district”). Federal Rule of Bankruptcy Procedure 1001 makes it clear that a “just, speedy, and inexpensive determination of every case and proceeding” must be at the heart of all procedural determinations. The Preference Action Procedures allow for a fair and efficient determination of the issues in each Preference Action.

29. 11 U.S.C. § 105(1) provides in relevant part that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” The Trustee submits that approval of the Preference Action Procedures is appropriate and well within the Court’s equitable powers under Section 105(a) of the Bankruptcy Code.

30. The Alternative Dispute Resolution Act of 1998 requires district courts to authorize use of alternative dispute resolution in civil actions, including adversary proceedings in bankruptcy. 11 U.S.C. §§ 651 *et. seq.*

31. Further, S.D. Ind. B-9019-2 states that “any contested matter may be referred to mediation by the court or by motion filed by any party.”

32. The rights of the parties are not substantively impacted by the Preference Action Procedures. See William J. Woodward, Jr., *Evaluating Bankruptcy Mediation*, J. DISP. RESOL. 1, 7 (1999) (“If a party is not satisfied with the terms of the proposed settlement, they are free to walk away from the mediation table and pursue their full legal rights in court.”).

33. Without the relief requested herein pertaining to discovery, the Trustee will be bombarded with burdensome and duplicative discovery requests. The stay on the Preference Actions will apply to both sides, ensuring that neither is gaining a competitive advantage. Further, the requested stay on discovery is limited in time and will not harm the defendants.

34. Procedures similar to those requested herein are often granted by courts in similar cases. See e.g. *In re ATA Airlines, Inc.*, No. 08-03675 (Bankr. S.D. Ind. Sept. 13, 2010); *In re Buehler Foods, Inc.*, No. 05-70961 (Bankr. S.D. Ind. filed May 4, 2005).

THEREFORE, the Trustee respectfully requests the Court’s entry of an order establishing certain procedures in the Preference Actions substantially in the form of the Procedures Order, and for any and all other relief just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2013, a copy of the foregoing Motion for Order Establishing Procedures for Certain Adversary Proceedings was filed electronically. Notice of this filing will be sent to counsel of record through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on January 22, 2013 a copy of the foregoing Motion for Order Establishing Procedures for Certain Adversary Proceedings was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the following:

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